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Agency Secretary

Air Resources Board

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Arnold Schwarzenegger
Governor

January 31, 2005

To: All Phase I and II Enhanced Vapor Recovery (EVR) Stakeholders

California Air Resources Board (ARB) staff would like your input regarding modification of the current performance specifications for cracking pressure of pressure/vacuum vent valves. Section 3.5 of the Certification Procedure for Vapor Recovery Systems at Gasoline Dispensing Facilities (CP-201) specifies that "The Executive Officer shall certify only those vapor recovery systems equipped with a pressure/vacuum (P/V) valve(s) on the underground storage tank vent pipe(s)." Specifically, section 3.5.1 defines the minimum level performance specifications for pressure settings for P/V valves as a positive pressure setting of 3.0 ± 0.5 inches H₂O and a negative pressure setting of 8.0 ± 2.0 inches H₂O.

ARB staff is considering a change to the specifications to better reflect valve performance under actual field conditions, e.g., the specifications could be changed to a positive pressure setting of 2.5 to 6.0 inches H₂O and a negative pressure setting of 6.0 to 19.0 inches H₂O. To our knowledge, there would be no increase in gasoline vapor emissions associated with this change to the specifications. These suggested performance specifications are provided only as an example and alternate specifications will be considered and evaluated.

We would appreciate your comments and suggestions on this issue of minimum level performance specifications for P/V valves. Specifically, we request any technical and/or legal information for maintaining current cracking pressures and proposed new cracking pressure specifications. Please provide a written response by no later than February 28, 2005. Written comments should be submitted by mail, email, or fax to:

Kevin Mongar
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Monitoring and Laboratory Division
Air Resources Board
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A copy of this letter, as well as a summary of comments and our responses, will be posted on the ARB Vapor Recovery Website at <http://www.arb.ca.gov/vapor/vapor.htm>.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

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If you have questions or need further information, please contact Kevin Mongar at (916) 322-2502 or via email at kmongar@arb.ca.gov.

Sincerely,

ORIGINAL SIGNED BY GEORGE LEW

George Lew, Chief
Engineering and Certification Branch
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cc: Richard Smith
San Diego County Air Pollution Control District

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Mojave Desert Air Quality Management District

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